

Dear Sir/Madam

re Planning Application DNS/3260565 – Brynrhyd Solar Farm:

This is a planning application for a 162 acre Solar Farm in Llanedi. **We oppose this development on the following grounds:**

We live in Llanedi, have been active supporters of renewable energy since 1972 and have solar panels on our roof.

Future Wales 2040

Policy 18 – Renewable and Low Carbon Energy Developments of National Significance Proposals for renewable and low carbon energy projects (including re-powering) qualifying as Developments of National Significance will be permitted subject to policy 17 and the following criteria:

2. There are no unacceptable adverse visual impacts on nearby communities and individual dwellings.

This proposed development is adjacent to an existing 70 acre solar farm in Tygroes with a further 55 acre application already approved.

Altogether this would form a block of 287 acres of solar panels, some of which will be on an elevated hillside and clearly visible.

A block this size would pose problems for wildlife, would mean a large loss of productive farmland and the loss of a farm tenancy for a younger generation. In this country we are nowhere near self-sufficiency in food and any further production loss is not appropriate.

Policy 18

4. There are no unacceptable adverse impacts on national statutory designated sites for nature conservation (and the features for which they have been designated), protected habitats and species;

The proposed solar farm abuts a meadow in this iconic landscape, which is home to Bryn-y-Rhyd standing stone (Ancient Monument No. 193) c3,000 BCE (Cadw), standing in a **Site of Special Scientific Interest**, a Traditional Hay Meadow, one of only **3% of hay meadows left** in the whole of the UK.

The field No 0846 at SN590085 is adjacent to the SSSI field Waun Garreg, No8747 at SN589085.

Dust from construction in this field and from the lane to be used as the main construction access road, is likely to adversely affect the SSSI field. This standing stone field has been traditionally farmed as hay meadow and is home to over 40 different flower species, including bluebells, betony, orchids, many grasses, Royal Fern and the rare Marsh Fritillary and Marbled White butterflies. Construction dust, pollution and decommissioning pollution from this proposed project are real concerns.

This field is a rare treasure handed down to us all and will be kept for everyone to enjoy but its diversity depends on sensitive care in the local environment.

A Green Future: Our 25 Year Plan to Improve the Environment

2018 states:

Protected sites (including our National Nature Reserves, Special Areas of Conservation, Special Protection Areas and Sites of Special Scientific Interest) have safeguarded many of our best wildlife habitats, but the wider environment needs to be considered too. Extensive data on species and ecological communities across terrestrial, freshwater and coastal habitats in the UK shows significant losses over the last 50 years, driven in large part by historic land use change and pollution.

Policy 18.

11. There are acceptable provisions relating to the decommissioning of the development at the end of its lifetime, including the removal of infrastructure and effective restoration. The cumulative impacts of existing and consented renewable energy schemes should also be considered.

It is worth noting that there are currently 5 solar farms approved but not built, in 5 villages, 4 existing and working in 4 villages and all within a 5 km radius.

While we support renewables, we think that we are putting too many eggs in one basket. Where will these thousands and possibly millions of panels be disposed of when they are obsolete or old? What about solar on buildings and roofs? Surely we need to start reducing energy consumption. With an increasing population and demand for more goods and electric cars, do we want to be constantly looking for land, which has not been covered with panels already? Where will we grow our food?

It is stated in the application that “Biodiversity would be promoted around and under the arrays.”

The application claims that grazing with sheep will encourage flower-rich meadow. Richard Pryce, former President of the Botanical Society of Britain and Ireland, states that “these are incompatible concepts, as sheep completely denude land of botanical diversity”. Experiments near Craigy-Nos showed that fencing areas off from sheep grazing produced a rapid increase in floral diversity but decreased diversity in the sheep grazed area. Grazing with cattle under the solar panels would be more suitable.

A 2 metre high deer-fence is to be erected around the site. Deer are not a feature of this area. It would be more appropriate to describe this as anti-human fence. Provision would need to be made for badger and fox access under the fence.

Environmental Science Magazine states:

Large solar farms such as those that have been built in the last several years in Southern California and the desert Southwest can fool birds into changing flight direction, sometimes during migration, to approach them because they appear to be lakes from a distance.

Insufficient research has been done into the long-term effects of such large-scale projects.

Nature magazine Oct 2016 stated:

“We found temperatures over a PV plant were regularly 3–4 °C warmer than wildlands at night.” Other research has found the opposite effect but both found temperature anomalies relating to climate change. It would be better, therefore, to have smaller solar farms in a mosaic pattern, which can be assessed until more information is available.

When conserving areas of land, it is important to look at larger landscapes to keep our habitat mosaics intact, especially in the face of global change. Shifting mosaic habitats keep our ecosystems resilient. Habitat mosaics are key to maintaining biodiversity and the ecosystem services we rely on.

State of Nature Wales 2016 key findings:

Over 5,000 of the species known to occur in Wales have been assessed using modern red-list criteria. Of these, 354 (7%) of these are at risk of extinction from Great Britain

A Green Future: Our 25 Year Plan to Improve the Environment 2018 states:

The effects on wildlife and habitats are stark. We are in danger of presiding over massive human-induced extinctions when we should instead be recognising the intrinsic value of the wildlife and plants that are our fellow inhabitants of this planet. Furthermore, human-induced climate change threatens unpredictable and potentially irreversible damage to our planet. It is in everyone’s interest to be part of the solution. Over the next 25 years we must safeguard the environment for this generation and many more to come. We plant trees knowing that it will not be us, but our children and grandchildren, who get to enjoy their shade. In the same way, we should take a long view of how our stewardship today can lead to a healthier and culturally richer planet tomorrow. We have already set out our plans to better conserve our heritage assets.

David Attenborough argues, “Biodiversity, is the answer to these problems. The significance of biodiversity in maintaining ecosystems both in our oceans and on land is not just so animals and plants can flourish, but so humanity can survive.”

“The Anthropocene could be the moment we achieve a balance with the rest of the natural world and become stewards of our planet.

Doing so will require systemic shifts in how we produce food, create energy, manage our oceans and use materials," he said.

"But above all it will require a change in perspective. A change from viewing nature as something that's optional or 'nice to have' to the single greatest ally we have in restoring balance to our world."

"It's surely our responsibility to do everything within our power to create a planet that provides a home not just for us, but for all life on Earth."

One of Wales' most well know naturalists and wildlife experts says Wales is currently in the midst of a catastrophic loss of its wildlife.

Iolo Williams spoke to WalesOnline Feb 2021: “Our abuse of the natural world is ruining not just our countryside, but also our own well-being.”

If large-scale developments like this are permitted then this also sets a precedent for large-scale loss of wild and food-producing land, which may then be liable to being built on when the project ends.

For future generations we need to consider our way forward carefully.

We, therefore, urge you to refuse this application.